

1 JOHNSON & PHAM, LLP
2 Christopher Q. Pham, SBN: 206697
3 E-mail: cpham@johnsonpham.com
4 Nicole Drey Huerter, SBN: 250235
5 E-mail: ndrey@johnsonpham.com
6 Hung Q. Pham, SBN: 276613
7 E-mail: ppham@johnsonpham.com
8 6355 Topanga Canyon Boulevard, Suite 326
9 Woodland Hills, California 91367
10 Telephone: (818) 888-7540
11 Facsimile: (818) 888-7544

12 Attorneys for Plaintiff

13 LAW OFFICES OF GEORGE A. SHOHET, A PROF. CORP.
14 George A. Shohet, SBN: 112697
15 E-mail: georgeshohet@gmail.com
16 9100 Wilshire Boulevard, Suite 720E
17 Beverly Hills, California 90212
18 Telephone: (310) 452-3176
19 Facsimile: (310) 452-2270

20 Attorney for Defendants

21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**

23 ADOBE SYSTEMS INCORPORATED, a
24 Delaware Corporation,

25 Plaintiff,

26 v.

27 METROTECH SOLUTIONS USA INC., a
28 Delaware Corporation; 9199-6546 QUEBEC
INC., a Canadian Quebecois Corporation
doing business as METROTECH
SOLUTIONS INC., METROTECH
SOLUTIONS and METROTECH; and DOES
2-10, Inclusive,

Defendants.

Case No.: 3:14-cv-04871-EMC

**STIPULATION TO EXTEND
DEADLINE TO COMPLETE
MEDIATION**

Plaintiff ADOBE SYSTEMS INCORPORATED ("Plaintiff"), by and through its counsel
of record, and Defendants METROTECH SOLUTIONS USA INC.; 9199-6546 QUEBEC INC.
d/b/a METROTECH SOLUTIONS INC., METROTECH SOLUTIONS and METROTECH;
9188-0047 QUEBEC INC. d/b/a UKTECH STORE; and 9199-6587 QUEBEC INC. d/b/a IT

1 FACTORY (collectively “Defendants”), by and through their counsel of record, hereby stipulate
2 and agree as follows:

3 **RECITALS**

4 On August 24, 2017, the Court ordered the Parties to complete mediation by no later than
5 November 22, 2017 (D.E. 48).

6 On September 22, 2017, the ADR office appointed Linda Joy Kattwinkel, Esq., to serve
7 as mediator.

8 The mediator and the Parties then arranged for mediation to take place on November 13,
9 2017.

10 On October 13, 2017, the mediator alerted the Parties that she had developed a conflict
11 that required her to be out of town that week and that the mediation would need to be
12 rescheduled.

13 There is no date prior to the current mediation deadline of November 22, 2017, that is
14 available for the mediator, all Parties, and their counsel. Instead, the date of December 12, 2017,
15 has been confirmed to reschedule the mediation.

16
17
18 ///

19
20
21 ///

22
23
24 ///

25
26
27 ///

1 **AGREEMENT**

2 Accordingly, Plaintiff and Defendants hereby stipulate and respectfully request the Court
3 extend the mediation deadline to December 15, 2017, and delay ruling on Plaintiff's pending
4 Motion for Contempt until sometime thereafter. The Parties shall submit a joint report regarding
5 mediation by no later than December 22, 2017.

6 DATED: November 13, 2017

JOHNSON & PHAM, LLP

7
8 By: /s/ Nicole Drey Huerter
9 Nicole Drey Huerter, Esq.
10 Attorneys for Plaintiff
ADOBE SYSTEMS INCORPORATED

11 DATED: November 13, 2017

LAW OFFICES OF GEORGE A. SHOHEI,
A PROF. CORP.

12
13 By: /s/ George A. Shohet
14 George A. Shohet, Esq.
15 Attorney for Defendants
16 METROTECH SOLUTIONS USA INC.; 9199-
17 6546 QUEBEC INC., d/b/a METROTECH
18 SOLUTIONS INC., METROTECH SOLUTIONS
and METROTECH; 9188-0047 QUEBEC INC.
d/b/a UKTECH STORE; and 9199-6587 QUEBEC
INC. d/b/a IT FACTORY

19
20 **~~PROPOSED~~ ORDER**

21 Pursuant to Stipulation, the deadline for mediation is extended to December 15, 2017.
22 The Parties shall submit a joint regarding the mediation by no later than December 22, 2017.

23 IT IS SO ORDERED. Further CMC reset from 12/7/17 to 1/18/18
24 at 10:30 a.m. An update joint CMC statement
25 due 1/11/18.

26 DATED: 11/16/17

27 HON. EDWARD M. CHEN
United States District Court
Northern District of California

